IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

FLORENCE DIVISION

Civil Action No. 4:2015-cv-01649-RBH

Nationwide Life and Annuity Insurance Company,)
Plaintiff,)
vs.) JOINT MOTION FOR STAY
Margaret Rose C. Sims, as the duly appointed)
Representative of the Estate of)
David Lee Sims, Jr. and Heather Sims,)
)
)
Defendants.	_)

The Defendants, Margaret Rose C. Sims and Heather Sims, submit this joint motion for stay.

These parties jointly move for a stay of this action as set forth in the proposed Consent Order submitted to the Court.

Respectfully submitted

_s/Louis D Nettles LOUIS D. NETTLES Folkens Law Firm, P.A. 601 West Evans Street Post Office Box 6139 Florence, South Carolina 29502 (843) 665-0100 Bar Number 2521 Attorney for Defendant Margaret R. Sims s/ Lonnie Morgan MartinFederal Bar No. 1057Law Offices of L. Morgan Martin, P.A.1121 Third Avenue

Conway, South Carolina 29526 Telephone: (843) 248-3177 Attorney for Defendant Heather Sims

E-Mail: fknowles@lmorganmartin.com

Florence, South Carolina April 27, 2016